

The Mobility Group

Transportation Strategies & Solutions

February 14, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Christopher,

RE: SB 743 – LOS Alternatives

Thank you for the opportunity to review and provide input to the OPR document of December 30, 2013 titled "Preliminary Evaluation of Alternative Methods of Transportation Analysis".

I am supportive of SB 743. I welcome a broader approach to transportation analysis than the currently focused intersection level of service, and understand the shortcomings of LOS and the need to move on from it for impact assessment. While the idea in general is a good one, I do think its implementation could actually be very complicated. Nevertheless I submit these comments from a positive frame of mind. I also submit these comments as a practitioner (transportation consultant) who will have to work with implementing whatever comes out of SB 743 on a daily basis in the land development field. I am therefore focused on the practical rather than the theoretical or philosophical. To be successful any new method will need to work for everybody.

GENERAL COMMENTS

The methodology should be readily implementable, standardized, and easily accessible.

This means it should not be over-complicated, but relatively simple to apply with accessible tools. The method should be "standardized" so that its application is consistent – between projects and between jurisdictions. For all its shortcomings, level of service (LOS) analysis methodology is a national standardized method, which provides for consistency of application. For all its critics as to its use, the fact is that we can all agree on the analytical

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results as generally consistent between projects and jurisdictions. Any new method should be similarly consistent – otherwise there will be far too much leeway for challenges.

It should be easily accessible in that it should not rely on central source modeling (i.e. not require regional or sub-regional modeling for each study application). It should not require regional level models to be run by MPO's for each study. Neither of these are practical. I think a methodology could use standardized data, parameters, and relationships that have been developed by/from MPO models – but that then have been distributed for common use by all jurisdictions (e.g. VMT relationships and parameters, look-up tables, and the like). These may need to be updated periodically by the MPO.

Response to the SB 743 mandate “to develop an alternative to LOS for evaluating transportation impacts” should consider not only methodologies but also implementation.

Discussion to date seems to have focused on developing a methodology for measuring impacts. However, developing a methodology is at best only half the picture. Any methodology then has to be implemented – which comprises three steps. Firstly applying the methodology, secondly determining impacts, and thirdly identifying suitable mitigation measures.

This means the methodology should be simple to understand and to apply (see Comment #1).

It also means that identifying suitable and workable thresholds of significant impact need to be closely considered, and that these thresholds be consistent across jurisdictions.

Finally, the types and feasibility of mitigations should also be considered, such that the methodology, the impact determinations, and the application of mitigations are effectively integrated into an approach that is both feasible and practical.

Without this three-way consideration, any alternative will be doomed to failure.

The State should provide thresholds of significance, or at least strong guidelines.

I work a lot in Los Angeles County – where there are 88 cities. A project impact analysis that would be based on VMT would often cover multiple jurisdictions. Jurisdictions may

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have little if any experience in setting thresholds for any new methodologies. Different jurisdictions may also develop different thresholds, which could make application of an alternative methodology like VMT extremely difficult and confusing. I think it is critical that if the state develops new methodologies for assessing impacts, it also at least sets guidelines for identifying significance thresholds and at best actually sets default thresholds (that jurisdictions could either use directly or modify).

A Proposed Alternate Methodology should be tested prior to recommendation.

The proposed alternate methodology should be tested with “trial applications” prior to recommendation. A range of “test cases” should be identified that represent the types of developments and projects that will be analyzed in the future – and a demonstration provided of how the methodology would be applied, how significant impacts would be determined, what types of mitigation measures would address the impacts, and how the mitigation measures would be applied and implemented. These “case studies” should be included in the July submittal by OPR.

Where is a new method to be applied?

While the alternate method should clearly be applied in urban areas (higher density centers and corridors), automobile LOS should be retained as a method outside urban areas – or at least in rural areas without transit. I am not sure about locations outside transit priority areas or suburban areas. I’m thinking OPR should probably delay any implantation in these areas pending experience and level of success in the more urbanized transit priority areas

What about impacts on transit?

The discussion so far has focused on alternate methods to evaluate impacts such as VMT or trips generated, with mitigation suggestions often involving greater use of transit. But what about impacts on transit? A truly successful program will in fact heavily impact transit through increased ridership and will require investments on transit infrastructure. Any method that does not address such impacts – with corresponding mitigations - may solve the “problem” academically on paper but will not solve the problem in reality on the ground.

Mitigation Measures

Mitigation implies estimation of impact. In CEQA this requires quantification. How would proposed mitigations such as TDM Programs, mix of uses, locations near transit, be quantified consistently between studies and applications, so they are applied fairly.

One mitigation measure discussed in OPR's Paper of December 30, 2013 is – locating a project in a more appropriate area – but developers own land in a specific location so cannot relocate the land or the project. So location of a project is more of a predetermined decision or measure rather than a mitigation. It may be that certain locations (such as in higher density areas, and areas with higher transit services) receive some form of credits or even relief, rather than thinking of location as a mitigation.

How to Implement Mitigation Measures Regionally

A criticism of intersection level of service is that it too local, and does not reflect the regional impact of development. However, using a regional impact method brings real issues of how mitigations would be implemented – particularly between jurisdictions. How are mitigations to reduce VMT to be applied to local projects, when greater use of transit requires regional level improvements to transit? How are fair share issues to be determined and implemented?

COMMENTS ON SPECIFIC MEASURES

Vehicle Miles Travelled

I think this is one of the most promising alternatives and hits the intent of SB 743 to reduce greenhouse emissions - as long as trip lengths can be applied from something like look-up tables (developed from regional models) rather than applying regional models each time. In reality – calculating trip length is I think actually fraught with issues, and VMT is not as simple as it sounds. It can vary significantly by location and specific geography, so using general parameters from federal, state, or even local models could provide wildly inaccurate estimates of trip lengths for specific locations – and lead to many challenges. I think a good approach might be to develop look-up tables for many different sub-areas of a region, and

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for numerous different scenarios – densities, proximity to transit, area land use mix, etc. Even when regional MPO models are used to develop these, I am not sure the results would provide the accuracy that may be required. I have a sense that VMT per capita may be a better parameter than plain VMT.

Automobile Trips Generated

I think ATG is an extremely appealing method. It is simple and easily understood. It does not lead into some of the more (regional) implementation problems of VMT. I think it is easier to apply, and easier to develop and implement mitigations for. Use of “Motorized Trips Generated” instead of just “Auto Trips Generated” would include the effects on transit.

Multimodal Level of Service

MMLOS is very complicated – it is difficult if not impossible to obtain a simple useful overall measure. Many have tried but have not achieved yet. MMLOS is therefore difficult to understand, but while at first blush a good concept, in reality it’s LOS x 4 in terms of amount of work and information to absorb. I don’t think is a practical or effective approach. Not recommended.

Fuel Use

While this may address greenhouse gas emissions it does not necessarily address system congestion, and is also influenced by factors completely outside the land use-transportation mix – i.e. engine efficiencies and engine types, electric vehicles, etc.). It is also more complicated analytically. Not recommended.

Motor Vehicle Hours Traveled

Much more complicated to calculate reliably and probably requires application of regional modeling tools – so not practical. Also more ambiguous in what it addresses and solves. Not recommended.

FINAL THOUGHTS

Reading through my comments I realize I have more comments on issues and questions than ideas for solutions. That's probably a function of where my initial thinking is on this. However, I hope the above comments prove useful in helping identifying things to watch out for and to consider moving forward.

In summary, I think VMT per capita and Motorized Trips Generated (MTG) are the most promising methods, and I would favor the latter.

I think it is critically important to consider how any method would be implemented – not only analytically, but practically in terms of what thresholds of significance would be applied and what/how mitigations would be implemented.

I also recommend a trial or test evaluation (case studies) of any recommend program to assure its effectiveness and practicality.

I think that implementation of SB 743 will move us from localized (intersection) mitigations to more areawide (sub-regional) mitigations – often involving increasing transit service. It seems to me that gets us into multi-jurisdictional issues and fair share contributions to regional-level mitigations. This suggests fee programs as key mitigation components.

As these thoughts come together in my mind, the most promising program I have seen is San Francisco's Citywide Transportation Sustainability Fee. As I understand it, this is based on motorized trips generated – a simple measure, easy to calculate and an accessible methodology. By using trips as a parameter it allows for projects to “self-mitigate” by providing a mix of land uses and locating in the right areas. It applies a fee determined from a citywide nexus study – resolving the fair share issue. And all fees go to funding transit improvements – thus providing transit mitigation and directly addressing the goals of SB 743. Their approach seems to effectively answer a lot of the questions I have posed in my comments. However, San Francisco has the good fortune of being a readily definable land mass with no land interaction on three sides – it is simple geographically and politically (well relatively). Here in Los Angeles County (with its many agencies and 88 cities, the County Transportation Authority (Metro) has been trying for over five years to adopt a Countywide Nexus Fee Program for the Congestion Management Program, albeit much more highway based – with high levels of resistance and no success). So using the San

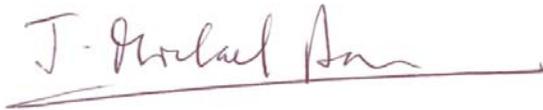
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Francisco model elsewhere could be quite problematical. Nevertheless I still think it probably offers the best potential.

I hope these comments are helpful. I would be happy to answer any questions or have a follow up discussion on any of these comments. I look forward to the next working group meeting in Los Angeles.

Sincerely,
The Mobility Group

A handwritten signature in dark ink, reading "J. Michael Bates", is written over a horizontal line.

J. Michael Bates
President